

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

**ASTORIA KING,
individually and on
behalf of those similarly
situated,**

Plaintiff,

vs.

**THREE SISTERS
ENTERTAINMENT, INC.,
et al,**

Defendants.

**CIVIL ACTION
1:22-cv-04235-LMM**

CONSENT MOTION TO EXTEND DISCOVERY PERIOD

Plaintiff Astoria King (“Plaintiff”), individually and on behalf of all others similarly situated, and Defendants Three Sister’s Entertainment, Inc. and Nianna Wright (“Defendants”), by and through their undersigned counsel, file this Motion to extend the Discovery period, showing this honorable Court as follows:

1. Plaintiff filed this civil action on October 24, 2022. [Doc. 1]. Defendants answered the Complaint on January 19, 2023 [Doc. 16].
2. On February 14, 2023, the Court adopted the parties’ Joint Preliminary Report and Discovery Plan, setting a four (4) month discovery period. [Doc. 19].
3. The Parties are presently attempting to resolve the case without

incurring additional costs and fees related to litigation.

4. The Parties are continuing to explore a potential resolution to this case but need additional time to complete discovery if they are unable to reach a settlement in principle, as the existing discovery is period is scheduled to close less than two (2) weeks from now.

5. The Parties jointly request that the discovery period be extended by 90 days, from its existing cut-off date of June 19, 2023, through and including September 19, 2023.

6. This extension is needed because the Parties have been trying to be cost-effective as they explore a potential resolution to this case but will need sufficient time to finish conducting discovery if they reach an impasse in settlement negotiations.

7. For the above and foregoing reasons, the Parties respectfully request a 90-day extension of the discovery period, and that all other pretrial deadlines be extended accordingly.

8. This motion is not brought for the purpose of delay, and the requested extension will not prejudice any party.

This 7th day of June, 2023.

Respectfully submitted,

PLAINTIFF ASTORIA KING

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